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ABSTRACT

This research brief uses data collected by the Center for Policy Research on the Impact of General and Special Education Reform to highlight issues surrounding the inclusion and exclusion of students with disabilities in state accountability systems. The brief discusses the background of standards-based reform, traditional general education accountability, and changes to general education accountability systems. Strategies for including students with disabilities in general education accountability are then reviewed and the role of federal compliance monitoring in accountability is outlined. Issues associated with including students with disabilities in general education accountability are discussed. Recommendations include: (1) special educators and families should be involved in discussions about state accountability systems and help shape accountability policies; (2) states need to establish policies that provide consistent guidelines for assessments; (3) state departments of education need to work closely with federal agencies when constructing integrated monitoring documents and policies; (4) special educators and families should be part of the development of state support strategies for failing schools as well as benefit from state rewards when schools perform well; and (5) continued efforts should be made to develop compliance monitoring that supports program improvement and student achievement. (CR)

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Issue Brief

State Accountability Systems and Students with Disabilities

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October 1997

The Center for Policy Research on the Impact of General and Special Education Reform

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State Accountability Systems and Students with Disabilities

Virginia Roach, Don Dailey, and Margaret Goertz

October 1997

The Center for Policy Research on the Impact of General and Special Education Reform

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The Center for Policy Research on the Impact of General and Special Education Reform

In October 1994, the U.S. Department of Education's Office of Special Education Programs (OSEP) established a Center for Policy Research on the Impact of General and Special Education Reform (the Center) to study the interaction between current general and special education policies and their impact on students with disabilities. The Center is a joint endeavor of the National Association of State Boards of Education (NASBE), the Institute for the Study of Exceptional Children and Youth at the University of Maryland (UM), and the Consortium for Policy Research in Education (CPRE) at the University of Pennsylvania, and is housed at NASBE.

Each Center partner is conducting interrelated three-year research studies that examine reforms in general and special education policies, their interactions, and their implications for students with disabilities. Areas being researched include standards and curriculum, assessment, accountability, teacher policy, finance, and governance, as well as state responses to federal programs such as Goals 2000 and the School-to-Work Opportunities Act. This issue brief uses data collected by the Center during its first year of research (1995) to 1) describe major trends in general education reform from a standards-based perspective across the 18 states in our study; 2) provide a preliminary assessment of the nature and involvement of special education in these reforms at the state level; and 3) discuss implications of these reforms for students with disabilities and related emerging issues.

STATE ACCOUNTABILITY SYSTEMS AND STUDENTS WITH DISABILITIES

Preface

In October 1994, the U.S. Department of Education's Office of Special Education Programs (OSEP) established a Center for Policy Research on the Impact of General and Special Education Reform (the Center) to study the interaction between current general and special education policies and their impact on students with disabilities. The Center is a joint endeavor of the National Association of State Boards of Education (NASBE), the Institute for the Study of Exceptional Children and Youth at the University of Maryland (UM), and the Consortium for Policy Research in Education (CPRE) at the University of Pennsylvania, and is housed at NASBE.

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Background

Over the past several years federal, state, and district policy makers have promoted a system of standards-based reform in order to simultaneously promote more rigorous curricula and goals for education as well as enhance the ability of *every* student to reach those goals. Standards-based reform emerged in the 1990s as a system of reform designed to address policy fragmentation generated by a series of conflicting state-initiated, top-down reforms (Smith and O'Day, 1991).

Standards-based reform has three primary tenets (Smith and O'Day, 1991):

- unifying vision and goals;
- coherent system of state policy guidance; and
- restructured governance.

As part of the restructured governance system, "state government is to set system and student goals for the state, coordinate these long-term instructional goals across various state policies, and hold schools and school districts accountable for meeting these goals." Changes in governance recommended under standards-based reform are based on the premise that local districts need flexibility to exercise critical judgement and mobilize resources necessary to help students achieve expected standards. However, with greater flexibility comes a commensurate increase in responsibility for student outcomes by local districts, schools, and teachers. While reformers have called for decentralizing authority and providing greater latitude in decision-making to district-and building-level educators, they also recognize a greater need for a state accountability system to ensure student progress. While many states have had accountability mechanisms in place, standards-based reform is encouraging states to look anew at their accountability systems, particularly with an eye toward associating accountability indicators with student outcomes instead of the input elements of schooling.

Accountability may be defined at two levels — *system* accountability and *student* accountability. *System* accountability includes measures designed to hold school and districts accountable. Traditionally,

system accountability has focused on resource inputs and processes perceived as necessary for schools to adequately serve students. With standards-based reform, system accountability reduces its emphasis on inputs and processes while it expands to include evaluation of student outcomes. Student outcomes typically are measured in terms of performance on assessments. Hence, three elements for system accountability are: inputs, processes, and student outcomes.

Student accountability is focused on measures designed to hold individual students accountable for their performance, including grading, promotion and graduation requirements. Graduation requirements may be based on passing a state graduation exam, obtaining a particular grade-point average, earning a particular number of Carnegie units, or some combination of all three. Grade promotion requirements may include obtaining a particular grade-point average or score on a state- or district-generated assessment. Student-level accountability components are often included in the larger state accountability system.

Accountability systems are structured through a variety of mechanisms, including district and state report cards, accreditation reviews, compliance monitoring of state and federal programs, and self-study/quality improvement plans. These reviews may be based on district- and school-generated indicators, or on state or federal indicators. Furthermore, local systems may be held accountable for meeting state standards, or for meeting district-developed goals. Overall, variations in state accountability models depend on:

- ***Who*** determines the indicators and standards to be used;
- ***Types*** of indicators included;
- ***Levels*** of the system that are held accountable;
- ***Consequences*** applied if a deficiency is found and not rectified; and
- ***Degree to which*** all students and programs are included in the accountability system.

Special education has so far played a limited role in standards-based reform (Goertz and Friedman, 1996). The purpose of this issue brief is to provide policymakers, practitioners and families information which enables them to become active players in developing new accountability systems that include students with disabilities. We will review the merits of including students with disabilities in state accountability systems, the ways in which state education accountability systems are changing, corresponding changes in special education accountability, and issues associated with including special education and students with disabilities in general education accountability. The issue brief will conclude with recommendations for families, educators, and policymakers at the state and federal levels.

The Importance of Including Students with Disabilities in General Education State Accountability Systems

Why is including special education and students with disabilities in accountability systems important? First, federal law requires it. Federal legislation enacted over the past several years requires that students with disabilities be included in different aspects of standards-based reform (Goals 2000: The Educate America Act, 1993; Improving America's Schools Act, 1994; IDEA, as amended, 1997).

Despite these measures, special education has played a limited role in creating standards-based reform policy (Goertz and Friedman, 1996), and students with disabilities are often excluded from the general curriculum, state and district assessments, and accountability at both the system and student level (Elliot and Thurlow, 1997; Roach and Raber, 1997).

In many schools, no one feels accountable for enhancing the outcomes of students with disabilities. Many educators and advocates contend that, although students with disabilities are increasingly educated in the general education classroom (Office of Special Education Programs, 1996), general educators do not

feel accountable for the performance of students with disabilities (Elliott and Thurlow, 1997; Roach and Raber, 1997; Schnorr, 1990). This is partially due to organizational factors. Students with disabilities often do not appear on the rosters of classes in which they are mainstreamed, are excluded from state or district assessment programs, and are not graded in the same manner as other students. This is, in part, a by-product of years in which special education has been structured and perceived as a separate system from the general program (NASBE, 1992).

Conversely, special educators may not feel accountable for the outcomes of students with disabilities. The majority of students receiving special education spend most of their time in general education classrooms. In addition, the only form of accountability in special education designed to focus on outcomes, the Individual Educational Plan (IEP), is primarily reviewed for due process compliance, not student outcomes.

Another reason for including students with disabilities in the general accountability program is because it functions as a key vehicle for including students with disabilities in more challenging curricula as defined in new state standards. Accountability is the state policy mechanism that links new standards to what is taught and tested in schools. New accountability systems are increasingly relying on assessments as tools for measuring student outcomes. Assessments are being developed based on state standards. In order to ensure that students perform well on assessments, teachers are supposed to teach to the standards. Within this framework, including students with disabilities in general accountability systems provides incentives for including them in the higher expectations associated with standards and should ultimately improve outcomes for those students.

Finally, if students with disabilities are not included in general education accountability systems, they will be perceived as existing in a separate system outside the mainstream student body. Attempts to include students with disabilities as part of the overall student population will be confounded by the perpetuation of dual accountability systems for general and special education. Unifying special and general education systems has been a reform theme since the early 1990s (NASBE, 1992; NASDSE, 1994). For some, including students with disabilities in the general accountability system is merely an extension of the inclusion movement that has been underway for several years. As such, advocates are supporting inclusion of students with disabilities in ***all*** facets of the general school system — including the accountability system.

Traditional General Education Accountability

Traditionally, states have held local education agencies accountable for:

- ***inputs*** to the education system;
- ***processes*** used in the education system; and
- ***operation of specific programs***, generally targeted at special populations of students.

Accountability has been largely based on inputs to the system. Examples of input measures include: number of books in the library, square footage allocation per student in a school, and the number and age of textbooks used in the district. This type of accountability assumes certain resources and conditions must be available to create a safe, productive learning environment. It also assumes that to the extent those resources are available, student learning will occur.

In addition to accounting for specific inputs, many accountability systems have also reviewed the processes used in the educational system, to determine if programs were being implemented with integrity and within the spirit of the policy that created them. Examples include the curriculum review cycle, or long-range facilities planning in a district. There are several types of process-oriented accountability systems, including accreditation reviews and school improvement reviews. Some of these reviews have traditionally been completed by state department of education staff in conjunction with district and school

officials. In some instances, independent accrediting bodies have worked with a state to conduct accreditation reviews. Overall, the traditional focus of accountability has been on the inputs to education, with the unit of analysis typically being the school building or district.

Finally, states have held local education agencies accountable for the operation of specific programs, generally targeted at special populations of students. This type of accountability has focused on particular groups of students with special needs, such as migrant students, poor students, or students with disabilities. This form of accountability is designed to ensure that either state or federal categorical aid is being allocated to support the student populations for which it is intended. The unit of analysis is the specific program, and, similar to accountability for general education, accountability for special education has focused on *inputs* and *processes* of program delivery rather than student outcomes. Traditional program compliance seeks to answer such questions as

- *Are the teachers funded through this program teaching students eligible for the program?*
- *Are the funds for the program being expended on materials for the program?* or
- *Has the program established the required parent advisory committee?*

Accountability Reform

Today, general education accountability systems are changing in two ways:

> (1) The substance of accountability — the nature of ***what*** schools and districts are being held accountable for — is changing. Accountability systems are evolving toward a focus on student outcomes and program improvement that includes all student populations and programs within general education accountability.
>
> (2) How accountability efforts are implemented — the ***process*** of how accountability is conducted — is changing. Accountability systems are evolving from a process utilizing checklists of inputs to a qualitative review of district and school plans and student outcome data.

Changes in the Substance of Accountability

Accountability systems are expanding and evolving to place greater emphasis on student outcomes. States are adding indicators to their accountability systems that describe student outcomes and making these indicators public through district and school report cards. In 1988-89, New Mexico established a state report card that ranks districts by test scores, and requires districts to publish an accountability report by school in their local newspaper. Revisions to Pennsylvania's education regulations in the early 1990s required schools to develop profiles to document student outcomes and describe educational programs.

Missouri provides one example of how a state has placed greater emphasis on student outcomes. In the past, the Missouri School Improvement Process used results from the Missouri Mastery Achievement Tests (MMAT) as one component of accountability. However, if a district was found deficient in student achievement (as reflected by its test scores) it could still be fully accredited if the other areas of evaluation — processes and input resources — were ranked high enough. Now, under standards-based reform, the highest possible accreditation status granted to a district with deficient student achievement is "provisionally accredited." Maryland, Kentucky, Texas, Florida and Colorado are but a few other states that have reformed their accountability systems to place greater emphasis on student outcomes.

It is important to note that while states have expanded their emphasis on student achievement, many states have maintained the process elements of their accountability systems. However, the process elements are evolving to focus more on *program improvement*. Indeed, states and independent accrediting organizations are encouraging districts and schools to use outcome data in developing plans for improving programs. States are implementing

processes that require districts to describe how they will help students meet standards established by the state. Some states have been adding elements of strategic planning to their accountability systems. In New Mexico, after developing focus areas jointly with the state, districts must submit a strategic plan, the *Educational Plan for Student Success (EPSS)*, upon which the district is evaluated in subsequent accreditation cycles. In 1993, amendments were made to Pennsylvania's education regulations requiring each district to develop a six-year strategic plan to guide schools in helping students achieve learning outcomes identified in the state education regulations. Regardless of their accreditation rating, districts in Missouri are required to write a school improvement plan addressing issues cited in state accreditation reviews.

In addition to emphasizing program improvement, some states are integrating their accountability systems so that different student populations are included in the same accreditation or accountability system. For example, California has historically integrated a number of programs for accountability purposes through its *Coordinated Compliance Review (CCR)* process. The CCR is primarily a coordinated compliance effort, that is, all categorically-funded programs arrange to have their compliance monitoring visits at the same time. The reviews include a visit to the school, parent interviews, classroom observations and document reviews.

Each program has its own compliance items that must be evaluated by team members. Local respondents report that the team members each

Regional Agencies Responsible for School Accreditation

Like states, independent accreditation agencies are also reforming their processes to emphasize student outcomes and program improvement. Independent regional agencies responsible for accreditation of schools engage in a two-tiered system of data collection. The first tier is focused on basic inputs and resources available to a school, the second on student outcomes and school improvement processes.

The first tier of data collection is based on traditional systems for accountability. This tier focuses on inputs, such as library holdings and number of faculty. Historically, these measures developed as mechanisms for quality control, were based on the assumption that inputs relate to quality, and were used to ensure that each school maintained a minimum level of resources necessary to perform basic school operations.

The second tier focuses more directly on indicators of quality as measured through student outcomes and school improvement processes. Student outcome data are used by the school as a source of self analysis, and contributes to the development of a school improvement plan. Student outcomes and the school improvement process are reviewed by a set of peers, typically a cross section of education personnel, who report back to the regional agency.

The two-tiered system is configured differently in each region. Until recently, some continued to place greater emphasis on inputs, while others began moving towards an emphasis on outcomes and improvement processes at earlier stages. Though input data are collected more frequently than outcome data in most regions, the general trend for all agencies is toward outcomes-based accountability.

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essentially go their separate ways when they get to the district so that CCR is basically a way to reduce evaluation burden on the district. However, it also has an integrated section of four "mega-questions[1]" that seeks to find out how well specially funded programs are integrated with a district's core curriculum and overall goals (Center for Policy Research, 1997a). In addition, states such as Missouri, have reworded their accountability standards so that they apply to all students, including those with unique learning needs.

Finally, the consequences for inadequate performance are expanding. Traditionally, states have withheld accreditation or funds for inadequate accountability reviews. Now, an inadequate accountability review in a district can trigger a range of responses, including additional funding, technical support, or even state intervention.

Changes in the Implementation of Accountability Efforts

The state role in accountability is also evolving. Rather than checking program elements against compliance or accreditation standards, state monitors are reviewing student outcome data and local plans for school improvement. In Pennsylvania, as a result of 1993 regulatory changes, districts were required to submit a strategic plan to the state to explain how they would help students reach learner outcomes established at the state level. Rather than merely rejecting or accepting plans, they were reviewed by the state and, if found deficient, sent back to the district with suggestions for improvement.

For many states, emphasis on program improvement is coupled with a focus on technical assistance (MacDonald, 1994, as cited in Schrag, 1996). States are attempting to provide technical assistance to districts to improve programs rather than merely citing a district as out of compliance. It is hoped that by providing technical assistance the state can help districts that might otherwise lack knowledge on how to correct its practices, while at the same time promote best practices among districts rather than merely minimal compliance. For example, through the on-site accreditation visit, New Mexico state officials are developing strategic focus areas jointly with local districts and then providing technical assistance through review of the districts's strategic plan. In order to emphasize technical assistance and program improvement, accountability in some states is changing from an episodic to an ongoing process. Whereas traditional district accreditation typically occurs on a three- to seven-year cycle, states are reviewing student outcome reports annually to check for yearly progress.

Traditional Special Education Accountability

Similar to traditional accountability systems for general education, accountability in special education has focused on compliance with program inputs and processes. The critical priority has been ensuring that districts are undertaking appropriate procedures to deliver programs in accordance with state and federal regulations. For example, districts are reviewed to ensure they are notifying parents of upcoming IEP meetings and testing students for program eligibility in a timely fashion. Accountability input measures for special education include the qualifications and number of special education teachers in a school, the number of speech therapists available to provide services, and the very number of students who qualify for special education — the child count (Elliot and Thurlow, 1997).

Ensuring access to special education for students with disabilities has been one of the focal points of special education accountability. One of the

[1] The four mega-questions are:

(1) Do students receiving special funding have access to the district's core curriculum?

(2) Do students receive the supplemental services they are entitled to that are related to the core curriculum?

(3) Is the whole a comprehensive coordinated program (does the program make sense)?

(4) Are specially-funded students learning the district's core curriculum?

mandates of special education is "child find," the requirement of districts to locate students who may be in need of special education services. Reviewing the child count for special education is a way to evaluate districts and states fulfillment of that requirement.

As with other categorical programs, special education compliance has traditionally been conducted separately from other general education accountability activities. Special education compliance is a major function of state department special education staff. Compliance indicators are derived from federal and state regulations. Since most states have additional laws and regulations pertaining to students with disabilities on top of the federal law, state compliance indicators for special education are often voluminous in comparison to indicators or compliance standards in other programmatic areas.

The focus of special education accountability has been on the due process procedures guaranteed under special education law, ensuring access to the program, and placement in the least restrictive educational environment possible, given the student's level of functioning. The only outcome-oriented accountability mechanism in special education is the Individualized Educational Plan (IEP), a document that describes, among other things, a student's annual goals and objectives. Yet, there have generally been no consequences attached to inadequate performance on IEP goals — either for the student, school or district — and the IEP itself has been subject to review more for due process purposes than for student outcomes.

Including Students with Disabilities and Special Education in General Education Accountability

Including Students with Disabilities in General Education Accountability

The chief way that students with disabilities have been included in the new general education accountability systems is through the inclusion of their test scores in school and district reports. Special educators and families have been working aggressively over the past several years to ensure that as many students as possible are included in state or district standardized testing. Yet, research shows that the extent to which students with disabilities are included in assessments varies widely based on the type of assessments given, accommodations available, how test scores are reported, and the consequences attached to the testing reports (Roach and Raber, 1997).

As general education accountability has begun to emphasize accountability for student performance (based on state assessments), students with disabilities seem to have been largely left behind. The National Center for Educational Outcomes reports that wide disparities exist in estimates of the extent to which students with disabilities have participated in state assessments. The results of their 1994 survey show most states *did not know* the rate of participation of students with disabilities in their assessments (Erickson, Thurlow and Thor, 1995). Currently, of the 48 states producing statewide educational accountability reports, only 17 have separate performance reports or data for students with disabilities, with every state having at least one report in which they do not specify whether certain data include students with disabilities (Thurlow, Lagenfeld, Nelson, Shin & Coleman, 1997 as cited in National Association of State Boards of Education, 1997b).

Newer state assessment and accountability policies, as well as the recently amended Individuals with Disabilities Education Act (IDEA, as amended, 1997), are requiring that students with disabilities be included in the testing process and that scores be reported in the state accountability system (IDEA, as amended, 1997; Elliott and Thurlow, 1997; Roach and Raber, 1997). Hence, inclusion of students with disabilities in this facet of accountability should increase.

Another way in which students with disabilities are included in state accountability systems is through graduation and diploma requirements. These requirements represent student-level accountability components that are part of a larger system of accountability. For individual students, high school

graduation is a paramount concern, followed by differentiated diplomas. Students first want to know if they will graduate, and with what type of diploma (e.g., standard diploma or certificate of completion). The type of diploma in some instances is dictated by the student's grade point average.

According to a survey conducted by the Council of Chief State School Officers (CCSSO), 38 states and terri-tories currently apply some graduation requirements to students with disabilities. Nine states require that all students, regardless of their disabilities, must meet all requirements for a standard diploma. However, 11 states allow graduation requirements for students with disabilities to be determined locally, guided by each student's IEP and an additional six states permit local districts to determine or waive diploma requirements for students with severe disabilities (Rhim and McLaughlin, 1997).

Overall, the policies related to graduation and diplomas create a system that can be subject to manipulation by parents, teachers and administrators. With respect to graduation, there seems to be considerable "wiggle room" in the system for students with disabilities. Of those states that allow graduation requirements for students with IEPs to be determined locally, the student's IEP team may alter the graduation requirements for a particular youngster, such as requiring six credits in mathematics instead of nine. As long as a student completes requirements specified on the IEP, the student can graduate with a regular diploma. However, the point at which these graduation requirements are determined on the IEP seems to vary from student to student. This variation leaves the system vulnerable to manipulation.

For example, in California, the state does allow the IEP team to make adjustments in graduation requirements for students with IEPs. The IEP team must meet to make any adjustments. One California district we visited has recently instituted new graduation requirements. Students must now have a 2.0 grade point average along with the proper credits to graduate with a standard diploma. In that district, a parent, teacher or administrator may request an IEP meeting to remove courses in which a student failed or received poor grades from those required for graduation. By removing courses from a student's requirements for graduation, the student's remaining grade point average increases, thus increasing the likelihood that the student will graduate with a standard diploma.

Including Special Education in General Education Accountability

Access and due process rights are foundations of federal and state special education laws. As general education moves away from compliance monitoring to outcomes reporting and program improvement planning, compliance monitoring remains an important element of special education accountability. Hence, general education accountability in some states may not encompass all aspects of special education accountability as dictated in federal and state law. Nonetheless, as states try to incorporate diverse students and programs into general education accountability, they are trying to incorporate special education accountability and monitoring into the general system as well.

States are working to coordinate the processes of general and special education monitoring as well as the substance of what is monitored. According to a recent survey by the CCSSO, 32 of 44 responding states include a review of programs and services for students with disabilities in their accreditation reviews (Rhim and McLaughlin, 1997). Special education is included in general state accountability systems in two ways: (1) coordinated monitoring and (2) integrated monitoring. In consolidated or coordinated monitoring, special education monitors comprise part of the monitoring team that visits a district. Once in the district, however, the special education monitors essentially conduct the same type of monitoring conducted when the systems were completely separate. Under a coordinated model, special education monitoring is put on the same cycle as other categorical compliance monitoring, or the general district accreditation process. As noted above, both Pennsylvania and Missouri have coordinated special education monitoring with other monitoring or accreditation visits conducted by the state. In coordinated monitoring, there may be no substantive change in either the monitoring process or the

substance of monitoring. However, since these monitoring activities occur at the same time as those of other categorical programs, or the general accreditation review itself, coordinated monitoring can spur joint planning by districts and schools.

Integrated monitoring is intended to be substantively different from traditional special education monitoring. In this model, monitoring changes to include joint planning and an integrated approach to accountability. Compliance questions may be reoriented toward program improvement and service delivery, using an entire school or district as the unit of analysis, rather than simply one program. Emphasis shifts from programs in isolation and eligibility for individual programs to the way in which different categorical programs complement each other to support student learning in the total school environment. State department of education staff report that the total number of performance items collected within an integrated approach are fewer than the total number collected from individual programs separately. In those states that have adopted a strategic planning approach, district special education staff are involved in developing the district's strategic plan in preparation for integrated monitoring. This type of monitoring is just emerging in states. In New Mexico, monitoring for federal and categorical programs has been folded into the *Educational Plan for Student Success (EPSS)* review process; hence, special education is involved in developing the plan upon which the district is evaluated in subsequent accreditation cycles.

State accountability systems are composed of several elements; therefore, newer types of special education accountability may co-exist with traditional forms of special education compliance within these systems. In addition, states may have elements of both systems (coordinated monitoring and integrated monitoring). For instance, California's Coordinated Compliance Review (CCR), cited earlier, includes both traditional monitoring in its alignment of the accountability cycles of several categorical programs, as well as demonstrating an integrated approach in its use of the four "mega-questions." In addition, states may be implementing a new accountability system based on program improvement that involves special education while also maintaining traditional special education compliance monitoring. Pennsylvania developed a strategic planning process for districts to include *all* students at the same time that it maintained its traditional special education monitoring (Roach and Raber, 1997). States may implement an integrated review process for districts in which special education staff are members of the review team, or perhaps even the team leader, while maintaining an essentially coordinated categorical monitoring process for special education. Such is the case in New Mexico.

The Role of Federal Compliance Monitoring in Accountability

Just as states are revising their accountability systems, the federal government is experimenting with coordinating its compliance review of federal categorical programs. Paralleling state efforts, federal coordinated compliance is designed to:

- Encourage states to conduct joint planning among the programs;
- Provide technical assistance as opposed to merely citing the state for compliance violations; and
- Foster ongoing, cooperative relationships as opposed to episodic, adversarial visits (Hoff, 1996).

Reflecting this emphasis, federal special education monitors identified improving outcomes for students with disabilities as their number one goal. Over the past two to three years, federal special education monitoring has shifted to focus more on outcomes (despite state complaints to the contrary). Changes include:

- Initiation of a series of small outreach meetings around a state being monitored to allow an opportunity for information exchange between the federal monitoring team and key constituents in the state. This is in addition to the traditional public meetings that are part of the monitoring process. These latter meetings typically offer

only one-way communication, whereas the small outreach meetings allow for two-way discussion. The outreach meetings allow the monitoring team to discuss with stakeholders in the state what areas to focus on and how to structure the state monitoring visit.

- New meetings between Office of Special Education Program (OSEP) monitoring staff and OSEP-funded project directors in the state, especially those involved with systems change projects, to learn about their initiatives and how they support the state's programming.

- Use of monitoring staff to serve as managers for the panels assembled within OSEP to review and score grant applications submitted in response to federal Requests for Proposals to gain a better understanding of emerging best practices in the field.

Monitoring staff credit the education reform movement, with its focus on student outcomes, for the changes made in federal monitoring over the past few years.

Issues Associated with Including Special Education and Students with Disabilities in General Education Accountability

In our tracking of 12 state accountability systems,[2] and more in-depth study of four of those systems, the following issues emerged with respect to accountability reform and students with disabilities.

Issues Associated with the Content of Accountability

General accountability systems that rely heavily on student achievement are inadequate for monitoring the progress of students with disabilities if they are not included in the assessments. Since student assessment results are the linchpin to new accountability systems, states that have inadequately included students with disabilities in their testing programs are ill-prepared to include students with disabilities in their accountability programs. Unless a state develops methods for including almost every student in their state assessment system, it will have to rely on other indicators to monitor the progress of students with disabilities and, hence, incentives for including such students in standards-based reforms will be diminished.

Accountability systems may mask pockets of poor achievement by schools or populations within schools, if data are not collected and reported in sufficient detail. State accountability systems relying on student assessments typically collect data only on district- or building-level performance. What is reported is often an average test score of the student population as a whole. In this instance, the outstanding performance of some students can counterbalance the poor performance of others, producing an average score for the total school population that appears adequate. This is a concern for any student population in state accountability systems, including students with disabilities. Unless a state or district reports student test data in sufficient detail, such as disaggregating test scores for students with IEPs, it will be very difficult to track the achievement of these students and hold districts accountable for their performance. In addition, most state accountability systems have little or no capacity to track the achievement of individual students or hold educators accountable for individual student performance.

State compliance staff feel pulled by federal compliance requirements when a state significantly collapses special education monitoring items into a more general, performance-oriented state format. Special education compliance items have reflected federal law that is primarily process-oriented (Elliott and Thurlow, 1997). As states develop performance-oriented accountability systems focusing on program improvement, special education staff perceive they are torn between satisfying federal procedural compliance items and fully participating in comprehensive state

[2] The states studied were: California, Colorado, Florida, Kentucky, Maryland, Michigan, Minnesota, Missouri, Nebraska, New Mexico, Pennsylvania and Texas.

accountability programs focused on program improvement and coordinated strategic planning. State staff feel both a programmatic tension as well as a time pressure. Programmatically, they are asking districts to focus on program improvements with an eye toward student outcomes, while simultaneously maintaining a high priority on procedural compliance. This system communicates mixed messages and complicates the capacity of districts to make decisions about where to focus attention. In addition, state staff feel they do not have sufficient time or staff to monitor districts for both program quality and procedural compliance. For example, state special education staff in New Mexico have been frustrated by their continuing need to respond to federal monitoring concerns while at the same time becoming more involved in their state's accreditation system, which is increasingly looking at program quality and student outcome indicators. California respondents were similarly concerned with how to maintain special education as part of the *Coordinated Compliance Review* process as that process becomes more focused on student outcomes and programmatic features (Roach and Raber, 1997).

Parents, teachers and students are concerned about the potential impact of new graduation and diploma requirements on students with disabilities. Alternatively, some educators and policymakers are concerned that current diploma and graduation requirements may give students with disabilities an unfair advantage in the system. With more rigorous standards for graduation, there is a possibility the already high dropout rates for students with disabilities (30%) will increase in those states that do not allow diploma alternatives for such students. Conversely, in some states and districts, there exists extensive flexibility in the graduation requirements for students with disabilities and their ability to earn a regular diploma (as opposed to a certificate of completion). As states and districts increase graduation and diploma requirements for the general student population, many students who are not in special education, but considered slow learners, are unable to qualify for a standard diploma. These students are now being awarded certificates of completion. Hence, two students who have roughly the same achievement profile—one in general education and one in special education — receive two different types of credentials. The former receives a certificate of completion, the latter a full diploma.

Implementation Issues

Special education staff are concerned that there is not enough time to monitor special education in all its required dimensions on coordinated review teams. Under a coordinated model, special education compliance monitors must conduct a full special education compliance review while also participating in team compliance activities. State monitoring staff have expressed concerns that they simply do not have enough time to attend to both activities. While other programs in the coordinated review may have eliminated aspects of monitoring to avoid duplication, there are typically more compliance items for special education and usually none of them are eliminated under this model.

Districts do not perceive monitoring as coordinated. Although all of the four states that were studied in-depth reported coordinating their special education compliance monitoring with general education monitoring, districts did not necessarily perceive it that way. District respondents in some study districts reported that state monitors, although arriving in the district at the same time, went in the direction of their own program and asked duplicative questions of district and school staff. In some study districts, respondents reported that programs were monitored at different times, even when the state had reported a coordinated accountability system.

Special educators and families worry about the state's motivation for developing integrated monitoring systems. When asked why they are trying to integrate or coordinate special education monitoring with general education accountability, state department of education staff generally cite two reasons. First, some states wish to combine special education monitoring with general education monitoring for philosophical reasons, i.e., inclusion. Second, other states say they are combining these efforts because personnel cuts in state departments of

education have forced state departments to be more creative in how they use their staff resources. Some states cite both reasons. When special education monitoring is combined with general accountability systems because of personnel shortages, advocates and special educators worry whether the system will really become concerned with and accountable for the outcomes of students with disabilities, or if accountability for these students will be secondary to administrative convenience.

Special educators and families worry about guaranteeing individual entitlement vs. group accountability on common standards. Special education is based on providing individualized accommodations, supports and services to students. For many students in special education, this has meant modifying the curriculum or providing an entirely different curriculum from the one provided to the general student population. If the new accountability systems are based on student achievement of common standards, special educators and families worry that attention to the individualization of special education will be lost. This can have consequences in two directions. First, general educators may drop some of the individualization associated with special education as they focus more on group accountability. Second, as the focus is on group accountability of general education, accountability for student outcomes in special education may never develop. For instance, how will *special education* be held accountable for student achievement? What consequences will be put in place as a result of student outcome accountability for special education? The answers to these questions may never be developed if the focus is primarily on group accountability for common standards.

Conclusion

Based on our research, and changes taking place in state accountability systems over the past several years, several conclusions are drawn.

In our study districts, respondents valued the utility of current special education monitoring based on the extent to which they believed process monitoring leads to better student outcomes. Special education was founded on the need to provide access to an educational system from which children and youth with disabilities were typically excluded. Hence, federal and state policy is highly prescriptive with respect to providing or denying that access, namely in terms of due process procedures, family participation in educational decisions, and providing a free, appropriate public education. The federal law, and corresponding state policy, is based upon that foundation of input policies. Guaranteeing the right to access programs, some believe, naturally leads to student achievement. For others, as with general education accountability reform, guaranteeing access to the system does not necessarily translate to improved student outcomes. Only by focusing specifically on student outcomes can we hope to improve student achievement for this — and any other — population of students.

There are compelling reasons to include students with disabilities and special education in the overall reform efforts and accountability. Including students with disabilities in general accountability systems can enhance the sense of responsibility general education teachers feel for the outcomes of students with disabilities as well as focus the entire school community on the outcomes of students with disabilities. In addition to the federal requirements, including students with disabilities also can lead to higher student expectations for students with disabilities and contribute to unifying the dual systems of general and special education.

As general education accountability evolves, states continue to struggle with establishing the correct mix of emphasis on process vs. student outcome accountability. States are shifting their emphasis in accountability from process and inputs to accountability for student outcomes. However, even with this shift in emphasis, many states continue to monitor program elements and input variables with an eye toward program improvement.

Shifting accountability to focus on whether or not students are meeting the new standards involves changing the orientation of accountability *and* "raising the bar" on student expectations for special education and students with disabilities. Although no state monitors *entirely* based on student

outcomes, states have definitely shifted accountability to focus on whether or not students are meeting new standards encouraged by the federal government and developed by the states.

Including special education and students with disabilities in the general state accountability system extends their franchise in the general system, but at this point does not exonerate a state from ensuring individual protections promulgated by IDEA. These systems do not need to be mutually exclusive. The degree to which the two systems can be merged will likely depend on the extent to which federal law and monitoring efforts eventually emphasize collecting data that complement general education's focus on student outcomes and program improvement processes.

Recommendations

Based on this discussion of state accountability systems, state and local policymakers, families, and others should consider the following recommendations:

- Special educators and families of students with disabilities should be part of the discussion about state accountability systems and help shape accountability policies that will truly meet the needs of all students.
- States need to establish policies that provide consistent guidelines for testing, testing accommodations, alternative assessments, and collection of student performance data on all students to ensure equitable comparisons among schools and districts for accountability purposes.
- State departments of education need to work closely with the Monitoring and State Improvement Planning Division of OSEP when *constructing* integrated monitoring documents and policies to ensure federal requirements for compliance monitoring are met.
- The purpose of state accountability policies is to ensure adequate student learning for all students in the state. Monitoring, accreditation, and assessment information is useless unless coupled with a system of technical assistance and support to enhance district and school programs when they are found lacking. Special educators and families of students with disabilities should be part of the development of state support strategies for failing schools as well as benefit from state rewards when schools perform well.
- Continued efforts should be made to develop compliance monitoring that supports program improvement and student achievement while still ensuring that students with disabilities have access to the support they need.

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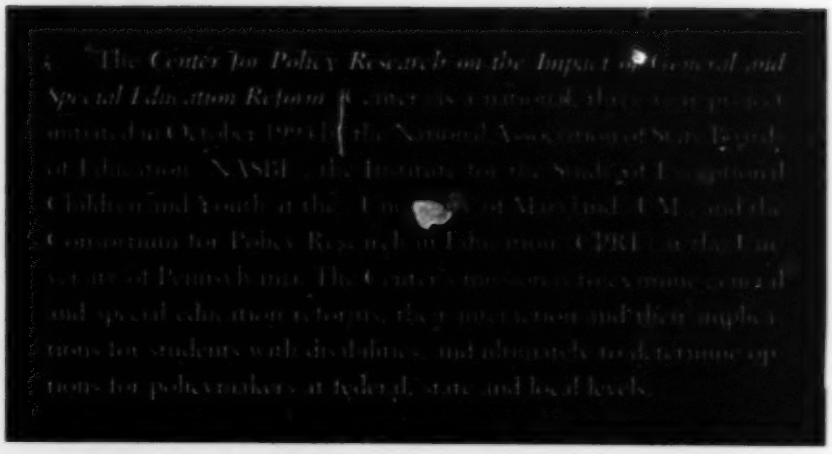

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